

Clarity Products, LLC submits these comments in response to the Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry released on June 10, 2018. In this document, the Federal Communications Commission (FCC) seeks comment on issues related to the FCC's Measures to Ensure the Sustainability of Internet Protocol Captioned Telephone Service (IP CTS). Specifically, the FCC is looking for comments on the need for third-party assessment of eligible users and program efficiency.

Clarity Products, LLC agrees with the FCC implementing rules which seek to control and measure the rapid growth of IP CTS minutes to safeguard the integrity of the TRS programs. IP CTS provides deaf and hard of hearing individuals an excellent opportunity to participate in telecommunication services using advanced technologies and the FCC should ensure this service is sustainable for future generations.

Clarity Products, LLC has worked closely with state TEDPs for many years. Each state has their own eligibility criteria based on specific rules and do an excellent job identifying what solution is best for the end users.

In conclusion, Clarity Products, LLC encourages the FCC to consider utilizing state TEDPs to conduct assessment for IP CTS applicants.